

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT BECKLEY**

MOUNTAIN VALLEY PIPELINE, LLC,

Plaintiff,

v.

CIVIL ACTION NO 5:23-CV-00625

MELINDA ANN TUHUS, and  
ROSE ZHENG ABRAMOFF

Defendants.

**NOTICE OF DEPOSITION OF MOUNTAIN VALLEY PIPELINE, LLC  
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Counsel for Defendants Melinda Ann Tuhus and Rose Zheng Abramoff, will take the deposition of Mountain Valley Pipeline, LLC (“MVP”) on **Thursday, November 14, 2024 at 10:00 A.M.**, remotely via Zoom videoconferencing, and continued until concluded. The deposition will be taken upon oral examination and recorded by audio, audiovisual, and/or stenographic means for the purposes of discovery or evidence or both before an officer duly authorized by law to administer oaths, and the same will continue from day to day until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiff shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf as to matters known or reasonably available to Defendants regarding the following topics:

1. The subject matter of all Requests for Admission that have been denied, including the subject matter of all related Interrogatories and Requests for Production.
2. All contracts and/or documents upon which MVP may rely upon to establish its claims for trespass and/or tortious interference.
3. The November 30, 2017 Pipeline Right of Way and Easement Agreement between MVP and the Wiseman Living Trust.
4. The April 11, 2017 Land License Agreement between MVP and CXS Transportation, Inc.

5. The contracts produced by MVP at 00122-00128, 00200-00252, and 00270-00364 of discovery.
6. The completeness or lack thereof of MVP's response to Request for Production No. 8 of the discovery requests served on September 16, 2024.
7. The accuracy and completeness of prior deposition testimony of EQM/EQT/Global Security witnesses Justin Caprio, Ralph Wright, Scott Dunn, Brian Murphy, and Adam Sloane.
8. The relevant portions of the Fiscal Responsibility Act referenced in MVP's Supplemental Rule 26(a)(1) Initial Disclosures filed October 30, 2024.
9. The relevant portions of the FERC Certificate referenced in MVP's Supplemental Rule 26(a)(1) Initial Disclosures filed October 30, 2024.

You may attend and defend your interests as they may appear.

**MELINDA ANN TUHUS  
ROSE ZHENG ABRAMOFF**

By Counsel

/s/ Jonathan Sidney

Jonathan Sidney

*Pro Hac Vice*

Colorado Bar No. 52463

Ohio Bar No. 0100561

Climate Defense Project

P.O. Box 97

Forest Hill, WV

Email: jsidney@climatedefenseproject.org

Telephone: (510) 318-1549

/s/ William V. DePaulo

William V. DePaulo, Esq. #995

860 Court Street North

Suite 300

Lewisburg, WV 25901

Phone: (304) 342-5588

Fax: (866) 850-1501

William.depaulo@gmail.com

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Amended Notice of Deposition was filed electronically with the Clerk of the Court, this 4<sup>th</sup> day of November, 2024, and thereby served on Counsel for the Plaintiff as follows:

Timothy M. Miller (WVSB #2564)  
Matthew S. Casto (WVSB #8174)  
Robert M. Stonestreet (WVSB # 9370)  
Jennifer J. Hicks (WVSB # 11423)  
Austin D. Rogers (WVSB #13919)

**BABST CALLAND, P.C.**  
300 Summers Street, Suite 1000  
Charleston, WV 25301  
Telephone: 681.205.8888  
Facsimile: 681.205.8814

/s/William V. DePaulo  
William V. DePaulo